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 DYNAMIC LEDGER SOLUTIONS, INC.,

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

GGCC, LLC, an Illinois Limited Liability
 Company, Individually and on behalf of all
 others similarly situated,

Plaintiff,

v.

DYNAMIC LEDGER SOLUTIONS, INC., a
 Delaware Corporation, TEZOS STIFTUNG, a
 Swiss Foundation, KATHLEEN
 BREITMAN, an individual, and ARTHUR
 BREITMAN, an individual,

Defendants.

Case No. 3:17-cv-06779-RS

**JOINT STIPULATION EXTENDING
 TIME FOR DYNAMIC LEDGER
 SOLUTIONS INC., KATHLEEN
 BREITMAN AND ARTHUR
 BREITMAN TO RESPOND TO
 COMPLAINT**

Judge: Hon. Richard Seeborg

1 Defendants Dynamic Ledger Solutions, Inc. (“DLS”), Kathleen and Arthur Breitman (the
 2 “Breitmans”) and plaintiff GGCC, LLC (“GGCC”) (collectively, the “Appearing Parties”) stipulate
 3 pursuant to Civil L. R. 6-1(a) to extend the time for DLS and the Breitmans to respond to the putative
 4 class action complaint filed by GGCC (the “GGCC Complaint”) (Dkt. No. 1) in the above-captioned
 5 action (the “Instant Action”) as follows:

6 WHEREAS, on November 26, 2017, GGCC filed the GGCC Complaint alleging violations of
 7 the Securities Act;

8 WHEREAS, Securities Act claims brought as class actions pursuant to the Federal Rules of
 9 Civil Procedure may be subject to the lead plaintiff provisions of the Private Securities Litigation
 10 Reform Act (“PSLRA”). *See* 15 U.S.C. § 77z-1;

11 WHEREAS, GGCC is in the process of serving DLS and the Breitmans with the Summons
 12 and Complaint in the Instant Action;

13 WHEREAS, on December 4, 2017, the Instant Action was deemed related to actions entitled
 14 *Okusko v. Dynamic Ledger Solutions, Inc., et al.*, 17-cv-06829, and *Baker v. Dynamic Ledger*
 15 *Solutions, Inc., et al.*, 17-cv-06850, and such actions were assigned to the Hon. Richard Seeborg;

16 WHEREAS, on December 8, 2017, GGCC filed a Notice of Publication of PSLRA Notice,
 17 which states that GGCC filed a notice in conformity with the lead plaintiff provisions of the PSLRA;

18 WHEREAS, GGCC intends to file a consolidated complaint that will serve as the operative
 19 complaint if it is appointed lead plaintiff in this matter;

20 WHEREAS, the Appearing Parties have met and conferred and agree that DLS and the
 21 Breitmans should not have any obligation to respond to any complaint filed in the Instant Action until
 22 a lead plaintiff has been appointed and a consolidated complaint is filed;

23 WHEREAS, this stipulated extension will not alter the date of any event or any deadline
 24 already fixed by order of this Court;

25 WHEREAS, there have not been any previous time modifications in this case; and

26 WHEREAS, DLS and the Breitmans agree to waive service of the GGCC Complaint as of the
 27 date of this Stipulation;
 28

NOW, THEREFORE, the Appearing Parties, hereby stipulate as follows:

1. DLS and the Breitmans shall not be required to move to dismiss or otherwise respond to the GGCC Complaint filed in the Instant Action until 30 days after the Court appoints a lead plaintiff and lead counsel, and lead plaintiff files and serves a consolidated complaint or a notice stating that lead plaintiff designates a previously filed complaint as operative. Pursuant to Civil L. R. 6-1(a), this paragraph shall be effective upon the filing of this Stipulation with the Court.

IT IS SO STIPULATED.

Dated: January 5, 2018

THE RESTIS LAW FIRM, P.C.

BAKER MARQUART LLP

/s/ William R. Restis
William R. Restis (246823)

/s/ Brian E. Klein
Brian E. Klein (258486)

Attorney for Plaintiff GGCC, LLC

Attorney for Defendants DYNAMIC LEDGER SOLUTIONS, INC., KATHLEEN BREITMAN, and ARTHUR BREITMAN

COOLEY LLP

/s/ Patrick E. Gibbs
Patrick E. Gibbs (183174)

Attorneys for Defendant
DYNAMIC LEDGER SOLUTIONS, INC.,

FILER'S ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), regarding signatures, Patrick E. Gibbs hereby attests that concurrence in the filing of this document has been obtained from all the signatories above.

1 Dated: January 5, 2017

COOLEY LLP

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3 /s/ Patrick E. Gibbs

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